



EPA Region 5 Records Ctr.



313809

August 31, 2007

Mr. Scott Hansen  
USEPA  
77 West Jackson Blvd.  
Superfund Division (SR-6J)  
Chicago, IL 60604

RE: Ashland/NSP Lakefront Site  
Final Remedial Investigation Report  
CERCLA Docket No. V-W-04-C-764  
USEPA ID# WISFN057952  
WDNR BRRTS #02-02-00013

Dear Mr. Hansen:

In accordance with USEPA's August 17, 2007 letter to Mr. Jerry Winslow, attached is the above. This document has been prepared in accordance with the approved RI/FS work plan, which in turn is based upon the Scope of Work (Task 7 (A) 2) appended to the November 2003 Administrative Order on Consent between USEPA and NSPW. The enclosed CD contains a pdf file of the entire document including text, tables, figures and attachments. A separate file in Word format of the text is also included.

As described in USEPA's August 17 2007 letter, which referenced the Agency's December 22, 2006 letter, USEPA provided Northern States Power Company (NSPW), (d.b.a. Xcel Energy) a notice of deficiency regarding the RI. USEPA provided a second notice of deficiency on July 9, 2007, giving NSPW 21 days to cure the deficiencies by incorporating USEPA's modifications. After numerous conference calls that took place between July 24 and 26, 2007, between NSPW, EPA and the Wisconsin Department of Natural Resources (WDNR) to discuss RI revisions, it was agreed that NSPW would submit proposed language changes to the RI by July 31<sup>st</sup>. USEPA, in consultation with WDNR, reviewed NSPW's proposed language changes. USEPA agreed to incorporate most of NSPW's language changes, however, other modifications contained in the notices of deficiency remained to be incorporated into the RI. Those changes were shown on a document submitted with the August 17, 2007 letter.

NSPW understands that because EPA has already provided two notices of deficiency to the RI, USEPA invoked its right to modify the RI pursuant to Subparagraph 21(c). To avoid further delays, which may be caused by the dispute resolution process, NSPW accepts the following document as the final RI for the Ashland/NSP Lakefront Superfund Site. However, NSPW objects to the following three modifications made by USEPA:

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**1. Section 4.3.3 Copper Falls Aquifer.**

In the second to the last paragraph of the Metals and Inorganics subsection on page 4-44, the last sentence (underlined) has been modified as follows:

*These data indicate that inorganic groundwater quality has been impacted in the area of the MGP. Although the full extent of inorganic contamination can not be delineated, due to the ubiquitous nature of several constituents (e.g., arsenic and iron), it is evident that the greatest inorganic concentrations detected occur in areas associated within the dissolved phase halo surrounding the DNAPL plume (e.g., MW-7B, MW-10A, MW-19A, MW-21B and MW-22B). Inorganic COPCs appear to be limited to cyanide, iron and lead. Cyanide is not measured beyond the wells in the immediate vicinity of the MGP. Arsenic, iron and lead are measured beyond the MGP and not all measurements are associated with releases from the MGP. However, much higher levels of arsenic, iron, and lead are measured at the MGP wells indicating that these metals are likely released into solution as a result of contact with Site source material. The high metals content at MGP wells may be caused by cation exchange with soil in the presence of the primary contaminant plume and may be associated with MGP process wastes.*

This last added phrase is speculative and not our conclusion.

**2. Section 5.1 Contaminant Characteristics and Persistence**

The last sentence (underlined) was added on page 5-9.

*Within sediments, the highest benzene levels have been measured just offshore north and west of the former WWTP. Within the Copper Falls aquifer, the highest benzene levels have been measured at MW-2A, immediately down gradient from the thickest product zones in the Copper Falls aquifer.<sup>1</sup> However, the extent of benzene in the Copper Falls extends to beneath Chequamegon Bay, in the vicinity of MW-24A and -25A.*

Benzene was detected at MW-25A at levels of 3.3 ppb, 0.15. ppb, ND and ND in four successive rounds; it was detected at MW-24A at levels of 11 ppb, ND, ND, and ND in four successive rounds. The conclusion from this year round data is that the trace detections are artifacts and that the compound is not present. This added statement is inaccurate. \

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<sup>1</sup> MW-2A was replaced with well MW-2AR following the clay tile investigation in 2001. Since that time, MW-2AR has yielded several feet of product. Analyses have only been performed on wells when less than 0.5 feet of product thickness has been measured in site monitoring wells.

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### 3. Section 5.1 **Contaminant Characteristics and Persistence**

The underlined text has been added and the text shown in bold has been deleted to the last three paragraphs in the SVOCs subsection on pages 5-12 and 5-13 as follows

*The source for SVOCs and PAHs in the filled ravine is recognized as the former MGP. The free product source areas associated with the MGP, which include the filled ravine and the seep area, but especially the material in the Copper Falls aquifer, represent tars similar to those released during plant operations. All these materials have an absolute limit of the total mass of PAHs, which as shown in the GP-122 sample is about 20,000,000 µg/kg. The dramatically higher concentration of PAHs at TP-133 (136,000,000 µg/kg) indicates a different composition from MGP waste tars and/or weathering, decantation or the addition of spilled products from the adjacent tank car siding.*

*One likely source of this contamination is residual wood treatment operations during Schroeder Lumber's tenure in the early 20<sup>th</sup> century. Other industrial activities may have also caused or contributed to these contaminant conditions. Spills of high PAH-laden feedstocks from rail car off-loading at this area for MGP and other industrial activities may be potential additional contaminant sources. The likely destination for these feedstocks was the MGP and/or Schroeder Lumber.<sup>2</sup> As described earlier, there is no historical record other than fuel oil as the feedstock for the former carbureted water gas facility. These spills would necessarily have been large and much of this material not recovered. Observations made during the test pit investigation identified the coal tar dump and material from inside the pipe at the bluff as the only areas at Kreher Park where free product was observed above the wood waste layer. Samples of this material from the dump area and the bluff pipe yielded the elevated PAH values. Samples from the former MGP site yielded significantly lower PAH values. Rail car spills may have dispersed across the coal tar dump and encroached the pipe, conveying contaminants along the bluff face. However, the data indicates this material is not derived exclusively from the waste tars found at the former MGP site but are most likely the result of spills of feed products.*

*Many subsurface soil and NAPL samples within the Kreher Park Area contained tar in various states of weathering. Lightly weathered tars have high levels of naphthalene and other volatile aromatic compounds (Figure 6a). Environmental weathering preferentially removes these more labile substances primarily by evaporation, dissolution, biodegradation, and other processes. Moderately weathered tars are left with lower levels of 2-ring PAHs and abundant 3-ring PAHs (Figure 6b). Heavily weathered patterns exhibit lower levels of 2- and 3-ring PAHs compared to 4-ring PAHs (Figure 6c). These high resolution*

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<sup>2</sup> MGP feed stock and later propane off-loading at the area of the seep following closure of the MGP in 1947 is documented. This propane was conveyed via underground pipe networks to storage tanks in the area of the NSPW storage building.

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hydrocarbon fingerprints identified commingling with non-tar derived materials such as diesel and heavy range petroleum (Figure 6c). The variable presence of petroleum among tar contaminated samples indicated that the petroleum and tar were independently released. Mixtures of tar and petroleum were observed towards the middle of the former Coal Tar Dump while samples around the boundary of the Coal Tar Dump contained primarily tar.

If the evidence of wood preservation at Kreher Park is ignored, weathering may explain higher PAH concentrations relative to VOC concentrations; however, it does not explain why PAHs are higher at Kreher Park than the upper bluff area. Although much of this added language was taken from the Forensic Report, contaminant mass does not increase by weathering, and therefore this explanation as inserted by USEPA is incorrect.

Sincerely,

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David P. Trainor, P.E., P.G.  
NewFields – Madison

cc: Bri Bill, USEPA  
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